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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

| | | |
|------------------------------|---|-------------------------------------|
| UNITED STATES OF AMERICA, |) | NO. CR 16-00227-SI |
| |) | |
| Plaintiff, |) | UNITED STATES' MOTION TO UNSEAL AND |
| |) | REQUEST FOR LEAVE TO FILE REDACTED |
| v. |) | APPLICATION AND ORDER AUTHORIZING |
| |) | TRAVEL RECORD PRODUCTION AND |
| BTC-E, A/K/A CANTON BUSINESS |) | ACCOUNT ACCESS; [PROPOSED] ORDER |
| CORPORATION, |) | |
| |) | |
| and |) | |
| |) | |
| ALEXANDER VINNIK, |) | |
| |) | |
| Defendants. |) | |

The United States of America ("the government"), through undersigned counsel, respectfully moves this Court to unseal redacted copies of (1) an application of the United States for an order authorizing travel record production and contemporaneous account access in matter No. CR-16-90391-

1 MISC-EDL; and (2) the Court order granting that application. The government also requests leave to
2 file the redacted versions of those documents in the above-referenced action.

3 Those documents are currently under seal and no longer need to be sealed except for the
4 redactions in the proposed versions. The redactions are necessary because they include PII, government
5 personnel email addresses, and information about sensitive law enforcement techniques. Proposed
6 redacted versions of the application and order will be lodged under seal with the Court as Exhibits A and
7 B to this motion.

8 Respectfully submitted,

9 ISMAIL J. RAMSEY
10 United States Attorney

11 DATED: July 3, 2023

12 /s/
13 CLAUDIA QUIROZ
14 KATHERINE LLOYD-LOVETT
15 Assistant United States Attorneys
16 C. ALDEN PELKER
17 Trial Attorney, CCIPS Assistant United States
18 Attorney

19 **[PROPOSED] ORDER**

20 On the motion of the United States, and good cause appearing therefor, the Court grants the
21 government's motion and ORDERS that the government may file the application of the United States
22 for an order authorizing travel record production and contemporaneous account access and the Court
23 order granting that application in matter No. CR-16-90391-MISC-EDL with the redactions proposed in
24 Exhibits A and B to the government's motion.

25 IT IS SO ORDERED.

26 DATED:

27 HONORABLE SUSAN ILLSTON
28 United States District Judge